

Colbert COLSF
NPDES 9.1 U1

June 24, 1993

Ken Merrill
SRPTAC Representative
Department of Ecology
4601 N. Monroe, Suite 100
Spokane, Wa 99205

Dear Mr. Merrill,

On May 27, 1993, Mike Kuntz, representing the Washington State Department of Ecology (WDOE) and Neil Thompson, representing the United States Environmental Protection Agency (USEPA) appeared before the Spokane River Phosphorus Technical Advisory Committee (SRPTAC) to inform members of the TAC of the details of the Colbert Landfill Project, and its potential to impact Long Lake phosphorus loading. They informed the TAC that the Colbert Landfill is an inactive, 40 acre municipal solid waste landfill which was closed in 1986. Ground water contamination, resulting from the landfill, has made necessary an extraction and treatment system which discharges via Little Spokane River to Long Lake. The SRPTAC became interested in this project for two reasons: 1) estimated discharges from the Colbert extraction and treatment system exceed the state water quality criterion, based on the phosphorus criteria established for the Long Lake reach of the Spokane River (0.025 mg/L). and 2) the Colbert Landfill extraction and treatment system is a point source of phosphorus. "Under the Spokane River Phosphorus Management Plan, no new point sources of phosphorus (other than participants to the plan) to the Spokane River will be permitted, unless an existing discharger agrees to remove an additional amount of phosphorus sufficient to offset the new source." No participant in the Phosphorus Management Plan has agreed to remove phosphorus if there is a net gain resulting from the Colbert project.

The SRPTAC is responsible for reviewing NPDES phosphorus discharge requirements for new dischargers and making its recommendations to the appropriate regulatory agency, in this case, the Department of Ecology. New point sources of phosphorus to the Spokane River system are considered to be undesirable because they have the potential to increase the aggregate phosphorus loading to Long Lake. The Colbert project is an effort to convert an uncontrolled non point source of pollutants to treatment, then point source discharge. The result, a nutrient rich flow is discharged where it is not beneficial. The positive aspects of the Colbert system are: 1) it will reduce contaminants reaching the ground and surface water and 2) it has the potential of future control and beneficial use of discharges.

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While it has not been determined whether the Colbert Project will increase the net flux of phosphorus to Long Lake, it is clear that the project, as planned, will lead to a permitted conveyance to the Little Spokane River. The point source should be granted proper authority. Spokane County, as the entity controlling this point source, should be granted all of the rights and responsibilities of other point source dischargers to Long Lake. The SRPTAC recommends, Spokane County join and participate in the Phosphorus Management Plan. The SRPTAC believes Spokane County's participation in the TAC is a prerequisite for future control of the Colbert Project.

In summary, the SRPTAC is interested and concerned about the Colbert Project for two reasons: 1) its anticipated discharge is greater than 0.025 mg/LP and, 2) it is a new point source discharge to Long Lake. While these aspects of the project are perceived to be negative, the TAC believes there are positive aspects that could allow it to support the project: a) it will reduce and control contaminants entering the River system and b) Spokane County's participation in the Phosphorus Management Plan will ensure control of phosphorus discharged by the project. The SRPTAC supports this project if the discharges are subject to the control measures of the Spokane River Phosphorus Management Plan.

Thanks for your consideration.

Sincerely,



Tim Pelton, Chairman
Spokane River Phosphorus Technical Advisory Committee

 *Assist. Super.*

H. Sid Fredrickson, Vice Chairman
Spokane River Phosphorus Technical Advisory Committee

cc: Amber Wong, US Environmental Protection Agency
Bonnie Rose, Washington State Department of Ecology